



FEDERAL BUREAU OF INVESTIGATION

Date of entry 02/27/2019

TIMOTHY BRUNOLD (BRUNOLD) was interviewed at the law offices of Gibson Dunn in Los Angeles, California. Present for the interviews via teleconference was IRS-CI Special Agent Elizabeth Keating, FBI Special Agents Laura Smith and Kaitlyn Cedrone, and AUSA Kristen Kearney. Present for the interviews in person was AUSA's Eric Rosen, Justin O'Connell, and Leslie Wright, Gibson Dunn attorneys Matt Coe'odess, Ross Halper, and Partner Debra Wong Yang. BRUNOLD provided the following information:

BRUNOLD has been the Dean of Admissions at the University of California (USC) for the last nine years. BRUNOLD started at USC as an intern and has been employed at USC for 26 years. BRUNOLD is responsible for undergraduate and graduate admissions and has 75 to 80 employees working for him. Two-thirds of the employees working for him are admissions officers and the rest are support staff. The Director of Undergraduate Admissions is Kirk Brennan (Brennan). BRUNOLD's responsibilities for graduate admissions is more back office work because each graduate school has its own decisions making authority. BRUNOLD reports to Katherine Harrington, Vice President of Admissions and Planning. She reports to the Provost.

USC undergraduate admissions officers are geographically divided. Any admissions officer can talk to athletes, however, the athletic committee and the admissions territory manager has to review the case. Territory managers review applications, calculate GPAs, and handle the application. Another person will also read the application. There is continuous sifting of the applications by others. Senior leaders review recommendations.

The application is submitted electronically. Admissions officers read the application online via the USC system located in California. USC uses the Common App. Admissions letters are posted online and 3 days later a paper copy of the letter is mailed. The letter is sent on approximately March 21, and by April 1, all students know their status. There is no early decision at USC. 90% of students have average test scores of 1600. The average GPA is 4.0 and average grade is an A. Admissions is not all about grades and test scores. USC has an 11% admissions rate with approximately 67,000 applicants. USC receives the second most applications of private universities. USC enrolls 3,000 freshmen each year and the

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yield is 40%. USC has guaranteed spring admission and students can go to another school in the fall, but they do not have to.

The athletic admissions process has different timing requirements. The admissions office reviews applications. USC wants to bring top athletes to the school to compete for national championships. The athletic department is responsible for identifying athletes. The athletic department presents athletes to the subcommittee (sub-co). Representatives on the sub-co are from the university. The individuals on the sub-co are BRUNOLD, Brennan, Assistant Dean Becky Chassin (Chassin), Assistant Director of Admissions Aaron Brown (Brown), and staff member Kelsey Bradshaw (Bradshaw). Sub-co is looking for a group of well-rounded student athletes.

Recruited athletes and walk-on athletes have a similar application process. Most walk-on athletes at USC are recruited athletes at other schools. Athletes average scores are lower than regular students scores. USC is interested in top student athletes regardless of numbers. USC has approximately 150 scholarship and walk-on recruited student athletes each year. Sub-co takes the coach's word about the student, and reviews the documents they are provided. An athletic liaison passes information about student athletes to BRUNOLD. BRUNOLD does not have interactions with the coaches because he does not want to influence them; he wants to have an intermediary between athletics and admissions. BRUNOLD likes working through an administrator. Coaches go through administrators so that there is no assumption that admissions is doing its own recruiting.

Donna Heinel (Heinel) is the Senior Administrator in the athletic department. Heinel oversees women's athletics but BRUNOLD's interaction with her is regarding all sports. BRUNOLD has known Heinel for a long time. They met before his current role and have known each other for approximately 10 years. Heinel was a staff member in athletics. Brandon Martin was the administrator before Heinel. She used to work for him. Heinel's athletic staff members are Alex Garrafalo and Kate Fuller. Heinel's role includes interacting with coaches, gathering packets of information from coaches about students, and presenting information to sub-co. The sub-co process is not that formal and Heinel provides committee members with documents in advance of the meeting if possible. Heinel sits down with committee members and goes through the list of students. Heinel advocates for students, answers questions, and is the liaison between coaches and the sub-co. Heinel will tell the committee that she spoke with the coach and that the coach needs these players. She does not recruit because she is not a coach.

(Agent Note: BRUNOLD reviewed documents bates stamped USC-00003683, USC-00003684, and USC-00003685)

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The initials in the SUBCO Comment/Interview box are from voting members Bradshaw, Brennan, and Clint Busia (Busia). USC wants three members to initial in the box. BRUNOLD votes with other members. Internal Code MVOL stands for men's volleyball. BRUNOLD understands that the spot list is the coach seeking to admit the student. Course curriculum factors range from 0 to 3 with 3 being the most rigorous curriculum. The course curriculum factors are determined by the admissions office. The factors include evaluating the number of honors and advanced classes a student takes. USC has the same course curriculum factors for non-athletes. Most students admitted have a course curriculum factor of 2 or 3. Institutional factor is based on the level of the high school. The factors range from 0 to 4 with 1 or higher being a good school. USC recalculates GPA and does not use the GPA listed on the transcript. The calculation is subjective and based on academic courses. The athletic department looks at the transcript first. The marking on [REDACTED] transcript was from calculating his GPA. The other factors box is not usually used that much; it may have some notes on it.

If BRUNOLD learned someone cheated on the SAT it would factor into the decision making process. It speaks to the character of the student. The Bizzack athletic profile is what sub-co received. The information in the profile is typical for an athlete. The profile provides a list of athletic accomplishments. Value to the team section is written by coaches, not Heinel.

Taking money to get a student admitted into school is not the way USC does things. Admission is not for sale. USC would be damaged if the public knew that spaces were for sale. BRUNOLD never heard anyone, including Heinel, say that they would recruit a student if the parents donate [REDACTED] money. If he heard that, he would ask the person why they are telling him this and explain to the person that is not how it works. He would educate them so it does not happen. BRUNOLD would consider it deception if someone recruited a student for money. He would want to know if something like that was happening. No one above BRUNOLD would condone that type of behavior. It would be problematic and an integrity issue if someone was accepting a student in exchange for money. USC does not do that.

BRUNOLD would not expect spots to be sold on the VIP list. BRUNOLD would not want to be involved with someone selling a VIP spot. He has never liked the term VIP. He would rather call it the special interest list. BRUNOLD hears from many people who want to recommend a student and does not want the student to fall through the cracks. BRUNOLD will keep an eye on approximately 1,000 files. He knows who gets turned down and who will make noise about it. The VIP list is not to get people in. The VIP list is a tracking process and athletes are a part of the VIP process.

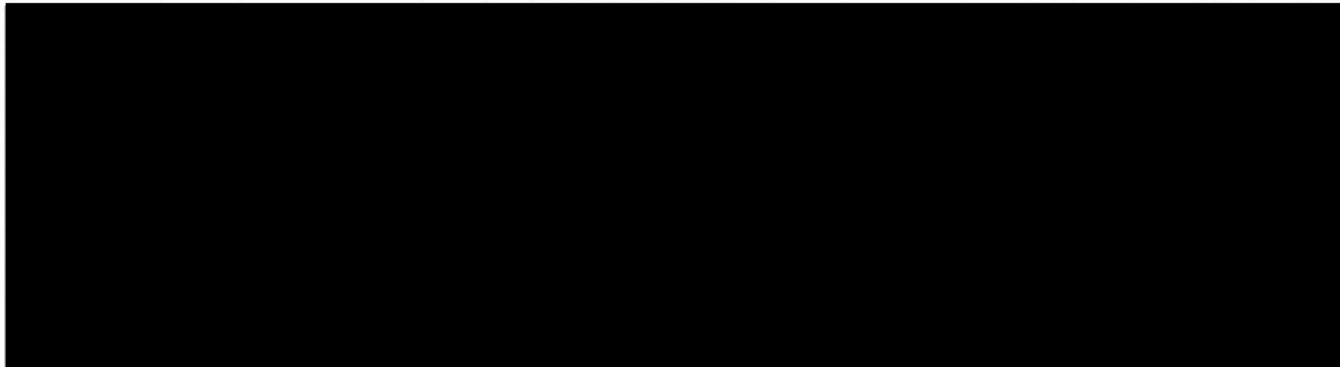
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People should not be taking money to be put on the list. If he found out that someone else took a class for a student he would not admit the student to USC. BRUNOLD is not involved with development.

(Agent Note: BRUNOLD reviewed documents bates stamped USC-00003661, USC-00003662, USC-00003663, and USC-00003664)

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Likely letters are usually sent from BRUNOLD's office. Sometimes letters are sent from athletics. The letter is sent if a student receives a scholarship. BRUNOLD believes the letter is sent through the mail.

(Agent Note: BRUNOLD reviewed a likely letter dated February 1, 2016 for Eric Alperin (Alperin) and the likely letter dated February 1, 2016 for Vanessa Feiwell (Feiwell)).

The initials at the bottom of the letter are BRUNOLD's and Brennan's. Walk-on athletes have to ask for a likely letter. The letter implicitly states that the student will be an athlete and must meet conditions such as maintain a certain GPA.

(Agent Note: BRUNOLD reviewed documents bates stamped USC-00007820 and USC-00007821)

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It goes against the process. USC does not want to turn off students who fit. USC tries to find students that are going to help the university meet its goals. Students are an asset to the university and USC uses admissions to further benefit the university. Pay to play would cheapen and hurt the university. It would hurt the chances of getting high caliber students. BRUNOLD hopes to have an admissions process that treats everyone equally. Parents of students who were not accepted send him letters describing how much they have donated. Donors would be upset if someone was involved in a pay to play scheme. BRUNOLD would have the same view if money went to a person instead of the program.

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Any kind of quid pro quo that effects the process is not okay. This is communicated to USC staff.

(Agent Note: Brunold reviewed documents bates stamped USC-00001962, USC-00001985, and USC-00002021)

[REDACTED]

In order to submit the application the student must check a box that states everything represented is true. If it is found out later that the information is false, the student's admission could be revoked, or the student could be expelled. If the student checks the box Hispanic or Latino the student should be Hispanic or Latino. The Common Application essay is a personal statement for all colleges. USC has a supplemental essay specific to the university. If a student lists awards on the application it is expected that the student received the award. Sometimes USC staff will investigate and reach out to the student and counselor. A student lying on the application is problematic and an integrity issue. Once someone becomes a student the admissions office loses authority and issues go through the university judicial process. USC can view a site that shows the schools that they attended. USC has an association that deals with conduct and policies. Staff is trained three times a year on the policies.

BRUNOLD would have less of an issue if a student did not know their score was obtained by someone else and thought it was true. That would not elevate the integrity issue. It is still an issue that it is not the students score.

(Agent Note: BRUNOLD reviewed an emailed dated 3/29/2018 3:20:08 PM)

The email was from Chassin. She wanted to do her own investigation and get answers. Chassin is the territory manager for Harvard Westlake.

(Agent Note: BRUNOLD reviewed documents bates stamped USC-00003717, USC-00003718, USC-00003719, and USC-00003720)

[REDACTED]